

Lanny M. Bush
2664 FM 2054
Tennessee Colony, Tx

United States District Court
33 Twohig
San Angelo, Tx 76903

July/25/2019

re; Motion for Appointment fo counsel/ Request for Clerks Docket Sheet
(cause No 6;19-00006-G, Bush v. Davis)

Dear Clerk,

Please find enclosed Petitioners motion for Counsel. please
bring to the Attention of the Honorable Justice at your earliest Convenience.
Also please furnish me a Copy of the Clerks Docket Sheet in this Cause.
thasnk you for your time.

 respectfully,
Lanny M. Bush Pro-Se

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
SAN ANGELO DIVISION

LANNY M. BUSH: PETITIONER

CLERK U.S. DISTRICT COURT
NORTHERN DIST. OF TX
FILED

V.

CIVIL ACTION: 6;19-cv-00006-C
2019 JUL 31 PM 3:09

LORIE DAVIS, DIRECTOR, TDCJ
RESPONDANT

DEPUTY

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MOTION FOR APPOINTMENT OF COUNSEL

TO HONORABLE JUSTICE OF SAID COURT:

COMES NOW, Petitioner, Lanny m. Bush, in the above sty;ed and numbered cause, whom files this Motion for appointment of Counsel, Pursant to 28 U.S.C. § 1915(e)(1), to represent and /or assist in this cause.

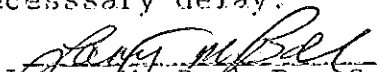
In support of this Motion Petitioner States;

1. Petitioner is unable to afford counsel, and has requested leave to proceed in Forma Paupris.
2. Petitioners Imprisonment will greatly limit his ability to litigate and secure vital and important documents that support the Allegations of his 28 U.S.C. § 2254, now pending in this Court.
3. The issues in this case are very complex and will require significant research and investigation, along with discovery, to sustain and support his Habeaus.
4. Petitioner has limited access to the Law library and limited Knowledge of Consitutional Law.
5. Any Hearings or Trials in this matter will involve conflicting testimony and counsel would better enable Petitioner to present Proper evidence and Allow Fairness in the justice system.
6. In accordance with federal esstablished law, Evidence exist that can be easily produced by an attorney that will support and confirm Petitioners claims, regarding, Brady Violation and Strickland.

Petitioner has repeatedly sought assistance from attorneys in this matter. (see Enclosed Letters)

Prayer

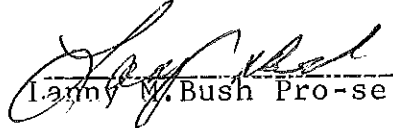
Wherefore premisis considered, Petitioner moves this Court to appoint Counsel in this matter, to either assist or Help produce Discovery in the intrest of Justice, and not for un-necesssary delay.


Lanny M. Bush Pro-Se

cc. retained

I do hereby certify that a True and Correct, Motion for Appointment of Counsel, has been Mailed , to the Honorable United States District Court, Northern District of Texas San Angelo, Correctly addressed and Sealed.

Done this 25 day of July 2019.


Larry M. Bush Pro-se

- end-

cc; retained

Lanny M. Bush 1917810
2664 FM 2054-MI Unit
Tennessee Colony, Texas 75886

John L. Blagg
504 Pecan St
Brownwood, Texas 76801

July/09/2019

re; Seeking Attorney assistance in a Criminal Matter,

Dear Sir;

I write to seek your assistane in a Criminal Matter inwhich I am Challenging my conviction out of Coleman County. You represented me in a Parole Revoation hearing and got me re-released from TDC. a Job very few People have accomplished. Your name came up in a Disposition from Perry Sims about the Tactis that were used in the Murder Trial by Michael Murry whereas he creates Conflicted intrest between the Defendant and the Attorney byputting the Attorneys Prior and Current clients on the States Witness list. This was allso done in my case out of Coleman County, but the only diffrence was that, had I known about it at the time, I could have forced the State to call this witness(Compulsaary Clause) and exposed the Tactis and Gifts that the witness recieved to testify, Instead I was denied that rigfht.

While it should be noted that the Witness Knew Absoulutely Nothingabout the case except f rom what he read and was told. My main points of errors are Brady Violation,(cuyler v. Sullivan) Coerced statements,(Miranda v. Arizona),Conflicted Intrested(KylseeV. Whitley) and 6th ammendemnt Violation for not allowing me to Cross examine a witness(Douglas v. ASa.)

Currently I have a Habeaus Corpus in Federal court, Northern Dist, San angelo divi(Bush v, Davis;6;19-cv-00006-C). As an indigent Offender I have an almost impossible chance of winning any relief when battling ALL the States Litigation division, even with such excellant Grounds. Most of the Ground work has been done and researched, it just needs fine Tuned by an expert. I plan to seek Counsel from the Courts in the near Future. What I need from you is one of two t hings, (or Both)(1) I need your legal assistance to fine tune this habeaus, OR (2) a affidavit from you stating that the District Attorney is Known for Creating conflict between the Client and Attorney, especially right before Trial in an atempt to get the Attorney to withdraw. (word as you Need).

I would greatly appericate your help in any form. I respect your decision, and I know that you are not swayed by Brown County Ploitics.

I await your reply


Lanny M Bush

cc/retained

Lanny M Bush 1917810
2664 FM 2054 -MI Unit
Tennessee Colony, Texas 75886

Scott Morelock
207 N. Fisk
Brownwood, Tex. 76801

July/09/2019

Re; Attorney assistance in a Criminal Case

Dear Sir

I write to seek your assistance in a CRiminal Case challenging my Conviction out of Coleman County. My main points of Error are; Brady Violation(Cuyler V. Sullivan), Coerced Statements, (Miranda V. Arizona), Conflicted Intrests, (Kyles v. Whitley) and 6th ammendment Violation (Complusory clause) Douglas V. alabama). In compliance with Local Court rules and Fed R. Crim Proc. I must seek counsel before any request to the Court. I am Now in the US District Court, Northern District of texas, San angelo division with a Habeaus Pending (22.54)(Bush v. Davis-6;19-cv00006-C). Your assistance would be greatly appericiated as an Indigent Offender as zero odds of winning agianst the State Attorney, even on such great Grounds of Error. Most of the Ground work has already been lain and researched as well, I need someone to Fine tune this Habeaus.

I await your response..

Respectfully;

Lanny M. Bush



cc/retained

Lanny Marvin Bush 1917810
2664 FM 2054- Michaels Unit, TDCJ
Tennessee Colony, Tex. 75886

Nina Meador
909 Main St.
Brownwood, Texas 76801

July -9th-2019

re; Attorney assistance in Criminal Case

Dear Attorney;

I write to seek your assistance in a criminal case challenging my conviction out of Coleman County. My main Points of error are, Brady Violation, (Cuyler V. Sullivan), Coerced Statements, (Miranda V. Arizona), Conflicted Interest, (Kyles V. Whitley) and 6th amendment violation, (Duglas V Alabama). In compliance with Local Court rules and US district Court rules, I have to seek Counsel myself before the Courts will appoint one. (BUSH V. DAVIS- 6:19-cv-00006-C) (Northern District of Texas, San Angelo Div).

Most of the Ground work has been done and researched and Submitted I need someone to fine tune this Habeas (22.54).

I look forward to hearing from you.

Respectfully;

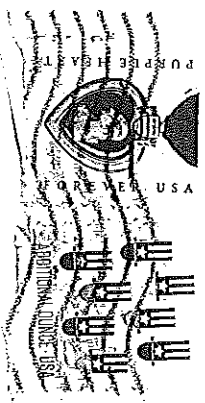
Lanny M. Bush



cc// retained

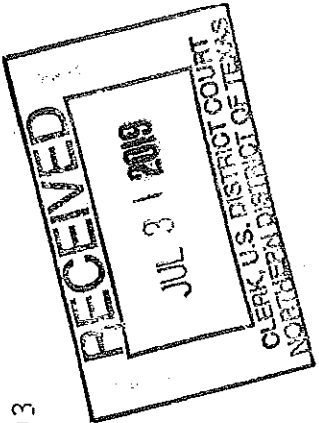
2664 FM 2054-Michaels Unit
Tennessee Colony, Texas 75386

NORTH TEXAS
DALLAS TX 750
29 JUL 2019 PM 5 L



United States District Court
33 Twohig Rm 202
San Angelo, tx 76903

*****LEGAL *****



76903-645152

